

SPIEGEL & MCDIARMID

#2. 6/6/06 10:30am

GEORGE SPIEGEL (1919-1997)
ROBERT C. MCDIARMID
ROBERT A. JABLON
JAMES N. HORWOOD
FRANCES E. FRANCIS
DANIEL I. DAVIDSON
THOMAS C. TRAUGER
JOHN J. CORBETT
CYNTHIA S. BOGORAD
SCOTT H. STRAUSS
BEN FINKELSTEIN
LISA G. DOWDEN
RISE J. PETERS
PETER J. HOPKINS
DAVID E. POMPER
WILLIAM S. HUANG

1333 NEW HAMPSHIRE AVENUE, NW
WASHINGTON, DC 20036

WWW.SPIEGELMCD.COM

Telephone 202.879.4000
Facsimile 202.393.2866
E-mail INFO@SPIEGELMCD.COM

Direct Dial 202.879.4002
EMAIL JAMES.HORWOOD@SPIEGELMCD.COM

ASSOCIATES

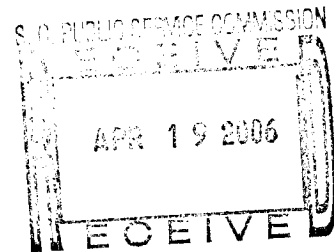
DAVID B. LIEB
PABLO O. NÜESCH
ANDREA G. LONIAN
LARISSA A. SHAMRAJ
STEPHEN C. PEARSON
SEAN M. FLYNN*
MELINDA CLAYBAUGH
(*MEMBER OF THE MD BAR ONLY)

OF COUNSEL

ALAN J. ROTH (1933-2003)
PAUL N. CONNOR**
MARK S. HEGEDUS
TILLMAN L. LAY
MARGARET A. MCGOLDRICK
MARGARET A. MEISER
JEFFREY A. SCHWARZ
BARRY M. SMOLER
SANDRA J. STREBEL
LEE C. WHITE
(**MEMBER OF THE OH BAR ONLY)

April 14, 2006

Mr. Charles Terreni
Chief Clerk of the Commission
SC Public Service Commission
P.O. Drawer 11649
Columbia, SC 29211



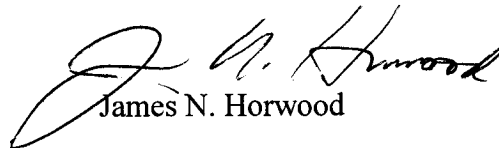
Re: Annual Review of the Purchased Gas Adjustments & Purchasing
Policies for South Carolina Pipeline Corporation
Docket No. 2006-6-G

Dear Mr. Terreni:

Enclosed please find for filing an original and ten (10) copies of the Petition to Intervene of the Department of Public Utilities of the City of Orangeburg, South Carolina in the above-captioned matter. By copy of this letter, I am serving all parties of record listed in the Commission's website.

I have enclosed an extra copy of this petition, which I would ask you to date stamp and return to me in the enclosed stamped self-addressed envelope. If you have any questions, please feel free to contact me.

Very truly yours,

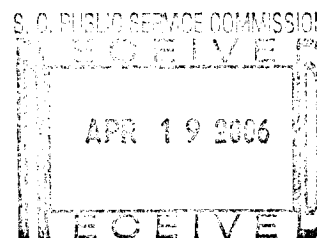

James N. Horwood

JNH:vja
Enclosures

cc: All parties of record (w/Encl.)

RETURN DATE: OK D. Duke
SERVICE: OK D. Duke
RECEIVED
APR 19 2006
PSC SC
DOCKETING DEPT.

BEFORE THE
PUBLIC SERVICE COMMISSION
STATE OF SOUTH CAROLINA



IN RE:

**South Carolina Pipeline Corporation
Annual Review of the Purchased Gas
Adjustments and Gas Purchasing
Policies**

Docket No. 2006-6-G

**PETITION TO INTERVENE
ON BEHALF OF
THE CITY OF ORANGEBURG, SOUTH CAROLINA**

Pursuant to the Public Service Commission ("Commission") Rule 103-836, the City of Orangeburg, South Carolina ("Orangeburg") hereby files this Petition to Intervene in this docket. In support of its petition, Orangeburg states as follows:

1. On October 5, 1987, the Commission issued an Order No. 87-1122 requiring an annual review of the Purchased Gas Adjustment and the Gas Purchasing Policies of South Carolina Pipeline Corporation ("SCPC").
2. The Commission has assigned Docket No. 2006-6-G to the referenced matter and has set a hearing for June 6, 2006.
3. Orangeburg is a political subdivision of the State of South Carolina that, among other things, is charged with purchasing natural gas for resale to its approximately 10,000 residential, commercial and industrial retail customers within and around the City of Orangeburg, and the towns of Cordova and Rowesville. Orangeburg provides retail gas service through its Department of Public Utilities ("DPU").

4. Orangeburg currently purchases a combination of transportation and bundled natural gas service from SCPC.

5. The matters before the Commission in this proceeding relate to issues directly affecting the City of Orangeburg, its citizens and inhabitants, and the retail gas customers of Orangeburg's Department of Public Utilities.

6. Given the state of the record at this stage in the proceeding , Orangeburg lacks sufficient information to fully develop and state its position in this proceeding at this time and does not know whether it will offer any testimony and/or evidence at the hearing.

7. Granting Orangeburg's request to intervene in this proceeding is in the public interest, is consistent with the Commission's policy to encourage maximum public participation on issues before it, and should be allowed so that a full and complete record can be developed.

8. Orangeburg's authorized representatives for purposes of this docket, to whom communications regarding this matter may be made, are:

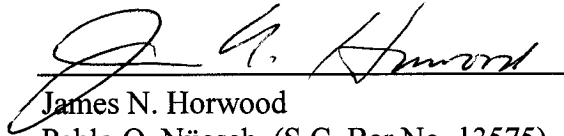
James N. Horwood, Esq.
Pablo O. Nüesch, Esq.
Spiegel & McDiarmid
1333 New Hampshire Avenue, N.W.
Washington, DC 20036
Telephone: (202) 879-4000

Mr. Fred Boatwright
General Manager
Department of Public Utilities
City of Orangeburg
P.O. Box 1057
Orangeburg, SC 29116
Telephone: (803) 268-4000

9. WHEREFORE, Orangeburg prays that it be allowed to intervene in this docket and all proceedings incident thereto, including the right to: appear as a party; engage in discovery; make motions; participate in hearings by offering testimony and

exhibits, and cross-examining witnesses; and receive service of all notices, documents, exhibits and data submitted by all parties and the Commission's staff.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "J. N. Horwood", is written over a horizontal line.

James N. Horwood
Pablo O. Nüesch (S.C. Bar No. 13575)
Spiegel & McDiarmid
1333 New Hampshire Avenue, N.W.
Washington, DC 20036
Telephone: (202) 879-4000
james.horwood@spiegelmc.com
pablo.nuesch@spiegelmc.com

Attorneys for the Department of Public
Utilities of the City of Orangeburg,
South Carolina

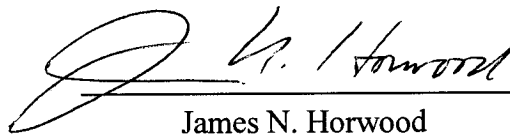
April 14, 2006

CERTIFICATE OF SERVICE

I hereby certify that I have caused the foregoing document to be served on the parties listed below by depositing a copy of same in the United States Mail, first class postage prepaid:

REPRESENTATIVE	ENTITY REPRESENTED
K. Chad Burgess Willoughby & Hoefer, P.A. P.O. Box 8416 Columbia, SC 29202	South Carolina Pipeline Corporation
Patricia Banks Morrison Senior Counsel South Carolina Electric & Gas Company Legal Department – 130 Columbia, SC 29218	South Carolina Pipeline Corporation
Paul W. Dillingham Spencer & Spencer, P.A. 226 East Main Street Suite 200 P.O. Box 790 Rock Hill, SC 29731	Chester County Natural Gas, Lancaster County Natural Gas, York County Natural Gas, and Patriots Energy Group
Wendy B. Cartledge Office of Regulatory Staff P.O. Box 11263 Columbia, SC 29211	Office of Regulatory Staff

Dated this 14th day of April, 2006, at Washington, D.C.


James N. Horwood